

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

US FOODS, INC., a Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cv-04790
)	
BOSTON MARKET CORPORATION, a)	Hon. Manish S. Shah
Delaware corporation, ENGAGE BRANDS,)	
LLC, a Delaware limited liability corporation,)	
and JIGNESH N. PANDYA, IV, an)	
individual,)	
)	
Defendants.)	

SUPPLEMENTAL DECLARATION OF DAVID J. DOYLE

I, David J. Doyle, declare and state as follows:

1. I am an attorney with the law firm of Smith Gambrell & Russell LLP (“SGR”).
2. US Foods, Inc. (“US Foods”) retained SGR to represent it in connection with the above-captioned civil action. I submit this supplemental declaration in support of US Foods’ motion for entry of default and default judgment (the “Motion for Default Judgment”) (ECF No. 17) against defendants Boston Market Corporation (“Boston Market”), Engage Brands, LLC (“Engage Brands”), and Jignesh N. Pandya, IV (collectively, the “Defendants”).
3. I incorporate by reference the statements in the Declaration of David J. Doyle attached as Exhibit 2 to the Motion for Default Judgment.
4. Between November 1, 2023 and December 31, 2023, SGR has billed US Foods an additional \$66,465.50 in attorneys’ fees, costs, and expenses relating to the firm’s efforts to enforce and collect on the Note (as defined in the complaint) and to collect amounts due under the Distribution Agreements (as defined in the complaint). True and correct copies of SGR’s time

entries for November 1, 2023 through December 31, 2023 and a summary of all attorneys' fees, expenses, and costs are attached hereto as Exhibit A.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2024

/s/ David J. Doyle
David J. Doyle

Exhibit A
Summary of Attorneys' Fees, Expenses, and Costs

Billing Month (End)	Total Fees	Total Expenses	Inapplicable Fees	Total Recoverable Fees & Expenses	18% Interest Through 2/1/2024
1/31/2023	\$10,246.50	\$0.00	\$8,101.50	\$2,145.00	\$387.16
2/28/2023	\$18,940.50	\$347.00	\$0.00	\$19,287.50	\$3,214.94
3/31/2023	\$3,607.50	\$0.00	\$0.00	\$3,607.50	\$546.17
4/30/2023	\$1,783.00	\$0.00	\$0.00	\$1,783.00	\$243.56
5/31/2023	\$8,913.50	\$0.00	\$0.00	\$8,913.50	\$1,081.34
7/31/2023	\$36,374.00	\$634.80	\$0.00	\$37,008.80	\$3,376.42
8/31/2023	\$8,020.00	\$0.00	\$0.00	\$8,020.00	\$609.08
9/30/2023	\$13,649.00	\$75.00	\$0.00	\$13,724.00	\$839.23
10/31/2023	\$10,690.50	\$262.60	\$0.00	\$10,953.10	\$502.34
11/30/2023	\$17,890.00	\$0.00	\$0.00	\$17,890.00	\$555.82
12/31/2023	\$48,527.50	\$48.00	\$0.00	\$48,575.50	\$766.56
Totals:	\$178,642.00	\$1,367.40	\$8,101.50	\$123,332.40	\$12,122.61

Vendor: Smith Gambrell (Atlanta)
Wire Address Information
Wells Fargo
420 Montgomery Street
For the Account Smith, Gambrell & Russell LLP
[REDACTED]
San Francisco, California 94104
United States

Invoice:
1145063 (pending 34 days)

	TOTAL	FEES	EXPENSES	TAX	BUDGET	FY	MATTER
Billed	\$17,890.00	\$17,890.00	\$0.00	\$0.00	[REDACTED]	[REDACTED]	[REDACTED]
Adjustments	\$0.00	\$0.00	\$0.00	\$0.00	[REDACTED]	[REDACTED]	[REDACTED]
Discounts	\$0.00	\$0.00	\$0.00	\$0.00	[REDACTED]	[REDACTED]	[REDACTED]
Total							

Inv. period: 11/01/23 - 11/28/23 Inv. date: 12/22/23 Inv. posted: 12/27/23 Inv. approved: -- Inv. sent to AP: -- Inv. paid: -- P.O.: Inv. Reference:

[REDACTED]
[REDACTED]

FEE LINE ITEMS

Date	Narrative	Timekeeper	Hours	Rate	Adjust	Amount	
11/01/23	Review attorney fee bills and redact same in connection with motion for default judgment; draft summary of billing statements for same; e-mail correspondence to Dave Doyle regarding same.	JANCZAK, ELIZABETH L.	0.8	\$480.00 USD	—	\$384.00 USD	✓
11/01/23	Phone conference with Terri Ahrens and Kerry Carlson to discuss [REDACTED]; review and analysis of draft of Doyle declaration and redacted invoices to submit as an exhibit in support of request for legal fees and expenses; communications with Liz Janczak regarding same; review and revision of draft default motion and review draft US Foods declaration.	DOYLE, DAVID J.	1.7	\$720.00 USD	—	\$1,224.00 USD	✓
11/02/23	Telephone conference with Dave Doyle regarding information for motion for default judgment and potential involuntary; additional review of attorneys invoices.	JANCZAK, ELIZABETH L.	0.5	\$480.00 USD	—	\$240.00 USD	✓
11/02/23	Review and analysis of revised redacted invoices from Liz Janczak that will be attached to declaration to support default motion.	DOYLE, DAVID J.	0.3	\$720.00 USD	—	\$216.00 USD	✓
11/03/23	Review client comments to motion for default and default judgment; conference call with Kerry Carlson and Dave Doyle [REDACTED].	JANCZAK, ELIZABETH L.	1.2	\$480.00 USD	—	\$576.00 USD	✓
11/03/23	Phone conference with Kerry Carlson and Liz Janczak to discuss [REDACTED]; review and analysis of current drafts of motion papers.	DOYLE, DAVID J.	1.4	\$720.00 USD	—	\$1,008.00 USD	✓
11/04/23	Revise motion for default and default judgment and supporting declarations; e-mail correspondence to client working group [REDACTED].	JANCZAK, ELIZABETH L.	1.5	\$480.00 USD	—	\$720.00 USD	✓
11/06/23	Review and analysis of markups to default motion and supporting declaration from Kerry Carlson; multiple communications with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED]; review and analysis of Doyle Declaration in preparation for upcoming filing.	DOYLE, DAVID J.	1.2	\$720.00 USD	—	\$864.00 USD	✓
11/07/23	Multiple communications with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED]; review and revision of same.	DOYLE, DAVID J.	0.7	\$720.00 USD	—	\$504.00 USD	✓
11/08/23	Conference call with Kerry Carlson regarding [REDACTED]; review and prepare for same, including review of updated exhibits and pleadings; telephone conference with Dave Doyle regarding same; additional review and final revisions to motion for default judgment pleadings; e-mail correspondence with working group regarding same.	JANCZAK, ELIZABETH L.	2.6	\$480.00 USD	—	\$1,248.00 USD	✓

Date	Narrative	Timekeeper	Hours	Rate	Adjust	Amount	
11/08/23	Review and analysis of October 2023 legal invoice for inclusion in default motion filing; communications with Liz Janczak regarding same; review and revision of default motion and supporting declarations; preparation of email to Liz Janczak attaching redlined drafts of same.	DOYLE, DAVID J.	1.5	\$720.00 USD	—	\$1,080.00 USD	✓
11/09/23	Draft notice of motion and certificate of service for motion for default judgment; finalize exhibits to motion for default judgment and prepare for filing; multiple e-mail communications with working group regarding default judgment issues.	JANCZAK, ELIZABETH L.	0.9	\$480.00 USD	—	\$432.00 USD	✓
11/09/23	Final review and revision of default motion and related motion papers for filing; multiple communications with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED]; exchange email with team regarding [REDACTED].	DOYLE, DAVID J.	2.0	\$720.00 USD	—	\$1,440.00 USD	✓
11/14/23	Telephone conference with Dave Doyle regarding defendants' appearance and motion for default judgment hearing.	JANCZAK, ELIZABETH L.	0.2	\$480.00 USD	—	\$96.00 USD	✓
11/14/23	Review and analysis of recent case filings by defense counsel; preparation of email update to Terri Ahrens and Kerry Carlson [REDACTED]; review and analysis of default motion and related pleadings in preparation for upcoming hearing on default motion; outline argument for hearing; review email from defendants' local counsel, Hal Wood.	DOYLE, DAVID J.	1.6	\$720.00 USD	—	\$1,152.00 USD	✓
11/15/23	Draft initial discovery requests, including requests for production and interrogatories, to each of three defendants.	GOTTLIEB, SARAH A.	2.7	\$370.00 USD	—	\$999.00 USD	✓
11/15/23	Preparation for and attendance at court hearing on motion for default; multiple communications with Liz Janczak and client following same; communications with Sarah Gottlieb regarding preparing initial written discovery to defendants.	DOYLE, DAVID J.	1.8	\$720.00 USD	—	\$1,296.00 USD	✓
11/16/23	Initial review of discovery requests to defendants; revise same.	JANCZAK, ELIZABETH L.	0.5	\$480.00 USD	—	\$240.00 USD	✓
11/16/23	Revise draft discovery requests	GOTTLIEB, SARAH A.	0.7	\$370.00 USD	—	\$259.00 USD	✓
11/16/23	Review and analysis of draft document requests and interrogatories to all three defendants from Sarah Gottlieb; revision of same.	DOYLE, DAVID J.	1.2	\$720.00 USD	—	\$864.00 USD	✓
11/17/23	Telephone conference with Dave Doyle regarding discovery to defendants; review and revise same based on Dave Doyle's comments; multiple e-mail exchanges with Dave Doyle regarding same; coordinate service of same.	JANCZAK, ELIZABETH L.	2.2	\$480.00 USD	—	\$1,056.00 USD	✓
11/17/23	Preparation of discovery to all defendants; preparation of email to Terri Ahrens and Kerry Carlson [REDACTED]; exchange email with Terri Ahrens regarding [REDACTED]; multiple communications with Liz Janczak and internal team regarding serving discovery on opposing counsel; preparation of email to opposing counsel attaching US Foods' first set of document requests and interrogatories.	DOYLE, DAVID J.	2.3	\$720.00 USD	—	\$1,656.00 USD	✓
11/28/23	Research case law regarding [REDACTED]; draft e-mail correspondence to Dave Doyle regarding same and recommendations on next steps.	JANCZAK, ELIZABETH L.	0.7	\$480.00 USD	—	\$336.00 USD	✓

EXPENSE LINE ITEMS

Date	Narrative	Timekeeper	Units	Rate	Adjust	Amount	✓
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There are no expense line items.

Vendor: Smith Gambrell (Atlanta)
Wire Address Information
Wells Fargo
420 Montgomery Street
For the Account Smith, Gambrell & Russell LLP
[REDACTED]
San Francisco, California 94104
United States

Invoice:
1147484 (pending 13 days)

	TOTAL	FEES	EXPENSES	TAX
Billed	\$48,575.50	\$48,527.50	\$48.00	\$0.00
Adjustments	\$0.00	\$0.00	\$0.00	\$0.00
Discounts	\$0.00	\$0.00	\$0.00	\$0.00

BUDGET	FY	MATTER
[REDACTED]	[REDACTED]	[REDACTED]

Inv. period: 12/01/23 - 12/28/23 Inv. date: 01/17/24 Inv. posted: 01/17/24 Inv. approved: -- Inv. sent to AP: -- Inv. paid: -- P.O.: Inv. Reference: --

[REDACTED]
[REDACTED]

FEE LINE ITEMS

Date	Narrative	Timekeeper	Hours	Rate	Adjust	Amount	
12/01/23	E-mail correspondence with Dave Doyle and Shelly DeRousse regarding furniture liquidators; update client e-mail [REDACTED].	JANCZAK, ELIZABETH L.	0.2	\$480.00 USD	—	\$96.00 USD	✓
12/01/23	Multiple communications with Liz Janczak regarding case status and issues raised by Terri Ahrens [REDACTED].	DOYLE, DAVID J.	0.3	\$720.00 USD	—	\$216.00 USD	✓
12/04/23	Exchange email with Liz Janczak regarding case strategy; review and analysis of email from Liz Janczak to Terri Ahrends regarding [REDACTED].	DOYLE, DAVID J.	0.2	\$720.00 USD	—	\$144.00 USD	✓
12/06/23	Review and analysis of plaintiff's response to default motion, answer and counterclaim, and initial disclosures; preparation of email to Liz Janczak regarding preparing reply brief in support of default motion.	DOYLE, DAVID J.	1.4	\$720.00 USD	—	\$1,008.00 USD	✓
12/07/23	Multiple phone and email communications with Terri Ahrens, Kerry Carlson, Liz Janczak, and Sarah Gottlieb regarding [REDACTED].	DOYLE, DAVID J.	0.5	\$720.00 USD	—	\$360.00 USD	✓
12/07/23	Review response to motion for default judgment and answer/counterclaim filed by Boston Market; e-mail correspondence with Dave Doyle regarding issues raised in same and reply to default judgment motion.	JANCZAK, ELIZABETH L.	3.1	\$480.00 USD	—	\$1,488.00 USD	✓
12/08/23	Continue drafting reply in support of motion for default judgment; research additional case law in support of same; conference call with working group regarding reply in support of motion for default judgment and strategy for addressing counterclaim.	JANCZAK, ELIZABETH L.	3.2	\$480.00 USD	—	\$1,536.00 USD	✓
12/08/23	Review and analysis of defendants' response to default motion, answer and counterclaim, and initial disclosures in preparation for upcoming client meeting; video conference with Terri Ahrens, Kerry Collins, Courtney Vandenburg, and Liz Janczak [REDACTED]; review portions of transcript from default hearing and email Liz Janczak regarding same.	DOYLE, DAVID J.	2.0	\$720.00 USD	—	\$1,440.00 USD	✓
12/11/23	Continue drafting reply in support of motion for default judgment; e-mail correspondence with Dave Doyle regarding same.	JANCZAK, ELIZABETH L.	1.9	\$480.00 USD	—	\$912.00 USD	✓
12/11/23	Preparation and revision of reply brief in support of default motion; review legal authority cited in support of same; multiple phone and email communications with Liz Janczak regarding same; preparation of cover email to client attaching draft of same.	DOYLE, DAVID J.	2.8	\$720.00 USD	—	\$2,016.00 USD	✓
12/12/23	Conference call with Dave Doyle and client working group [REDACTED]; telephone conference with Dave Doyle regarding same; review Pandya bankruptcy filing and article relating to same; e-mail	JANCZAK, ELIZABETH L.	1.5	\$480.00 USD	—	\$720.00 USD	✓

Date	Narrative	Timekeeper	Hours	Rate	Adjust	Amount	
12/12/23	correspondence to working group regarding same and impact on reply in support of motion for default; review litigation hold letter and provide comments for same. Video conference with Terri Ahrens, Kerry Carlson, Courtney Vandenburgh, and Liz Janczak [REDACTED]; follow-up phone conference with Liz Janczak regarding same; communications with team and client regarding [REDACTED].	DOYLE, DAVID J.	1.3	\$720.00 USD	—	\$936.00 USD	✓
12/12/23	Attention to case updates and discovery matters, including potential new discovery to serve.	GOTTLIEB, SARAH A.	0.3	\$370.00 USD	—	\$111.00 USD	✓
12/13/23	Review and revise reply in support of motion for default; e-mail correspondence with Dave Doyle regarding same; finalize reply in support of motion for default for filing.	JANCZAK, ELIZABETH L.	1.8	\$480.00 USD	—	\$864.00 USD	✓
12/13/23	Telephone conference with Kerry Carlson [REDACTED]; e-mail correspondence to Sarah Gottlieb regarding same; review MDA and applicable law regarding motion to seal; review initial disclosures and draft summary of same; review and prepare for 12/14 client conference call regarding discovery and litigation strategy; telephone conferences with Hal Wood regarding motion to seal answer exhibits.	JANCZAK, ELIZABETH L.	2.4	\$480.00 USD	—	\$1,152.00 USD	✓
12/13/23	Final review and revision of reply brief in support of default motion; multiple communications with Liz Janczak and US Foods team [REDACTED]; multiple phone and email communications regarding other case developments, including confidentiality issues relating to Boston Market's filings and Jay Pandya's individual bankruptcy filing.	DOYLE, DAVID J.	1.8	\$720.00 USD	—	\$1,296.00 USD	✓
12/13/23	Correspondence with Liz Janczak regarding trade secret/filing under seal issue; review issue and consideration of potential motion.	GOTTLIEB, SARAH A.	0.8	\$370.00 USD	—	\$296.00 USD	✓
12/13/23	E-mail correspondence to Terri Ahrens and Kerry Carlson regarding [REDACTED].	DEROUSSE, SHELLY A.	0.2	\$615.00 USD	—	\$123.00 USD	✓
12/14/23	E-mail correspondence to Hal Wood regarding necessary redactions to answer exhibits; draft outline for conference call with US Foods employees [REDACTED]; telephone conferences with Dave Doyle regarding same and various open litigation items; conference call with US Foods working group [REDACTED].	JANCZAK, ELIZABETH L.	2.4	\$480.00 USD	—	\$1,152.00 USD	✓
12/14/23	Preparation for and participation in videoconference with Terri Ahrens, Kerry Carlson, Liz Janczak, and other members of US Foods team [REDACTED]; review and analysis of materials from client relating to same; communications with Liz Janczak regarding case assignments and strategy; correspond by email with opposing counsel regarding confidentiality issue; review and assess initial disclosures for possible supplementation; review and analysis of motion to seal filed by Boston Market; communications with client [REDACTED].	DOYLE, DAVID J.	2.4	\$720.00 USD	—	\$1,728.00 USD	✓
12/14/23	Communications with Liz Janczak regarding answer to counterclaim; initial review of counterclaim.	GOTTLIEB, SARAH A.	1.0	\$370.00 USD	—	\$370.00 USD	✓
12/15/23	Begin drafting list of supplemental information for second round of discovery requests to Boston Market; review Pandya bankruptcy docket and evaluate potential strategies for bankruptcy case; telephone conference with Shelly DeRousse regarding same.	JANCZAK, ELIZABETH L.	1.6	\$480.00 USD	—	\$768.00 USD	✓
12/15/23	Telephone conference with Liz Janczak regarding bankruptcy.	DEROUSSE, SHELLY A.	0.1	\$615.00 USD	—	\$61.50 USD	✓
12/15/23	Review and analysis of order from Judge Shah regarding plaintiff's motion to seal; preparation of email to client [REDACTED]; communications with Liz Janczak regarding discovery issues.	DOYLE, DAVID J.	0.3	\$720.00 USD	—	\$216.00 USD	✓
12/18/23	Continue drafting supplemental discovery requests to Boston Market; telephone conference with Dave Doyle regarding next steps in litigation and strategy for same; conference call with client working group [REDACTED]; telephone conference with Shelly DeRousse and Dave Doyle regarding strategy and next steps for Pandya bankruptcy case; e-mail correspondence with Sarah Gottlieb regarding district court discovery.	JANCZAK, ELIZABETH L.	4.8	\$480.00 USD	—	\$2,304.00 USD	✓
12/18/23	Telephone conference with David Doyle and Liz Janczak regarding bankruptcy issues; review Pandya bankruptcy case.	DEROUSSE, SHELLY A.	0.8	\$615.00 USD	—	\$492.00 USD	✓
12/18/23	Phone conference with Terri Ahrens and rest of US Foods team [REDACTED]; follow-up conference call with Liz Janczak regarding same; review and analysis of defendants' responses to US Foods' document requests and interrogatories; forward same to Terri Ahrens and Kerry Carlson; strategy call with Shelly DeRousse and Liz Janczak to discuss Pandya bankruptcy; review and analysis of draft supplemental discovery from Liz Janczak.	DOYLE, DAVID J.	3.0	\$720.00 USD	—	\$2,160.00 USD	✓
12/18/23	Review Defendants' initial disclosures and counterclaim and outline recommendations for supplementing written discovery.	GOTTLIEB, SARAH A.	2.1	\$370.00 USD	—	\$777.00 USD	✓
12/19/23	Review Defendants' responses to discovery requests; draft summary of issues with same; e-mail correspondence to working group regarding same; conference call with client working group [REDACTED]; research case law regarding [REDACTED] in connection with Pandya bankruptcy; research potential affirmative defenses to counterclaim; telephone conference with Sarah Gottlieb regarding same; telephone conference with Dave Doyle regarding same and strategy for addressing counterclaim.	JANCZAK, ELIZABETH L.	4.8	\$480.00 USD	—	\$2,304.00 USD	✓
12/19/23	Phone conference with Terri Ahrens and rest of US Foods team [REDACTED]; preparation and revision of supplemental document requests and interrogatories to Boston Market and Engage Brands; review and analysis of legal authority for potential use in motion to strike affirmative defenses; exchange email with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED].	DOYLE, DAVID J.	3.8	\$720.00 USD	—	\$2,736.00 USD	✓
12/19/23	Communication with Liz Janczak regarding case status and litigation strategy; consideration of potential counterclaim defenses.	GOTTLIEB, SARAH A.	0.7	\$370.00 USD	—	\$259.00 USD	✓
12/20/23	Telephone conference with Shelly DeRousse, Jason Torf, and Tom Fawkes regarding Corner Bakery bankruptcy and issues relating to Jay Pandya; telephone conferences with Dave Doyle regarding strategy for responding to counterclaim, discovery, and motion to strike affirmative defenses; review and revise answer to counterclaim and affirmative defenses; draft motion to strike defendants' affirmative defenses.	JANCZAK, ELIZABETH L.	5.7	\$480.00 USD	—	\$2,736.00 USD	✓
12/20/23	Draft answer and defenses to Boston Market's counterclaim.	GOTTLIEB, SARAH A.	2.1	\$370.00 USD	—	\$777.00 USD	✓

Date	Narrative	Timekeeper	Hours	Rate	Adjust	Amount	
12/20/23	Telephone conference with Jason Torf and Tom Fawkes regarding Jay Pandya; telephone conference and e-mail correspondence regarding potential local counsel for Pandya bankruptcy. Phone conference with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED]	DEROUSSE, SHELLY A.	0.9	\$615.00 USD	—	\$553.50 USD	✓
12/20/23	[REDACTED]; preparation and revision of answer to counterclaim; preparation and revision of motion to strike defendants' affirmative defenses; preparation of email to Terri Ahrens [REDACTED]. Telephone conference with Scott Klein regarding Meridian Bank claims against Jay Pandya and Pandya's bankruptcy case; e-mail correspondence with Dave Doyle regarding affirmative defenses; revisions to US Foods' answer to counterclaim; telephone conference with Shelly DeRousse regarding local counsel and lien issues; conference call with US Foods team [REDACTED]; review and revise answer to counterclaim based on same. Phone conference with Terri Ahrens and US Foods team [REDACTED]	DOYLE, DAVID J.	5.8	\$720.00 USD	—	\$4,176.00 USD	✓
12/21/23	[REDACTED]; preparation and revision of answer to counterclaim, motion to strike affirmative defenses, and supplemental discovery; multiple communications with Terri Ahrens, Kerry Carlson, and Liz Janczak [REDACTED]; revision of answer based on comments from US Foods team and circulate new draft to Terri Ahrens and Kerry Carlson.	JANCZAK, ELIZABETH L.	2.1	\$480.00 USD	—	\$1,008.00 USD	✓
12/21/23	Telephone conference with Jeffrey Hampton regarding local counsel representation; telephone conference with Adam Toosley and Elizabeth Janczak regarding UCC issue.	DOYLE, DAVID J.	4.9	\$720.00 USD	—	\$3,528.00 USD	✓
12/21/23	Analysis of defendants' discovery responses and took notes regarding deficiencies to highlight in correspondence to opposing counsel; review and analysis of recent case correspondence; communications with Liz Janczak regarding next steps.	DEROUSSE, SHELLY A.	0.5	\$615.00 USD	—	\$307.50 USD	✓
12/22/23	E-mail correspondence to Dave Doyle regarding open litigation items and deadlines; telephone conferences with Dave Doyle regarding same; draft exhibit to motion to strike; review and finalize motion to strike and answer to counterclaim; draft proposed confidentiality order per local form; e-mail correspondence with working group [REDACTED].	DOYLE, DAVID J.	0.6	\$720.00 USD	—	\$432.00 USD	✓
12/27/23	Final review and revision of motion to strike defendants' affirmative defenses; final review and revision of answer to Boston Market's counterclaim; multiple communications with Terri Ahrens and Liz Janczak [REDACTED]; review and comment on Liz Janczak's revision to Northern District of Illinois model protective order for dissemination to opposing counsel; review and revision of US Foods' second set of document requests and interrogatories for service on opposing counsel.	JANCZAK, ELIZABETH L.	2.4	\$480.00 USD	—	\$1,152.00 USD	✓
12/27/23	E-mail correspondence to working group regarding [REDACTED]; e-mail correspondence with Dave Doyle regarding second set of discovery requests; revise and finalize second set of discovery requests; draft e-mail correspondence to opposing counsel regarding same, confidentiality order, and production specifications; review Court's order on motion to strike.	DOYLE, DAVID J.	3.3	\$720.00 USD	—	\$2,376.00 USD	✓
12/28/23	Final review and revision of second set of document requests and interrogatories and blanket protective order prior to dissemination of same to opposing counsel; preparation of email to Liz Janczak regarding same; preparation of cover email to opposing counsel regarding same and deficiencies in defendants' prior discovery responses; preparation of email to Terri Ahrens and Kerry Carlson [REDACTED]; forward email to opposing counsel to Terri Ahrens and Liz Janczak.	JANCZAK, ELIZABETH L.	0.9	\$480.00 USD	—	\$432.00 USD	✓
12/28/23		DOYLE, DAVID J.	1.4	\$720.00 USD	—	\$1,008.00 USD	✓

EXPENSE LINE ITEMS

Date	Narrative	Timekeeper	Units	Rate	Adjust	Amount	✓
12/01/23	E124 - Other Charge for Transcript - - VENDOR: COLLEEN M CONWAY 11/15/23 TRANSCRIPT OF MOTION HEARING	—	1.0	\$48.00 USD	—	\$48.00 USD	✓